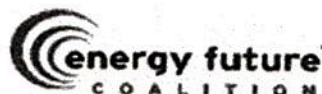


**From:** Dustin Thaler  
**Sent:** Mon 3/31/2014 4:36:29 PM  
**Subject:** [Final Reminder] You are registered for Health Effects of Fine Particles from Vehicle Emissions on April 1  
Health Effects of Fine Particles from Vehicle Emissions



National Institute of  
Environmental Health Sciences



**This is the final reminder that you've have registered to join the Energy Future Coalition and the National Institute of Environmental Health Sciences to participate in a workshop on the Health Effects of Fine Particles from Vehicle Emissions** on Tuesday, April 1, from 9:30 am to 5 pm. It will be hosted by the Institute of Medicine in the auditorium of the National Academy of Sciences, 2101 Constitution Avenue, in Washington, D.C., and is free and open to the public. *An Outlook calendar block has been attached to this e-mail for your convenience.*

**We have additional space available, so please forward this e-mail ([registration link here](#)) to colleagues of yours that might be interested.**

**If you have requested a webconferencing link, you have likely already received it through e-mail. We will send the link to those who have requested it once more later today.**

Numerous scientific studies have linked exposure to particle pollution to a variety of serious health problems and premature death, with growing concern about the less well-known role of ultrafine particles. Such pollution from gasoline use in motor vehicles appears caused by the use of aromatic hydrocarbons – benzene, xylene, and toluene -- to boost octane; these compounds comprise more than 20 percent of every gallon of fuel. The public health effects of motor fuel pollution have been topics of concern to the Energy Future Coalition for nearly a decade and have important implications for environmental and energy policy. In particular, ultra-fine particles (UFPs), because of their nano size, have a unique ability to reach the heart and lungs and enter the bloodstream, delivering a toxic payload of polycyclic aromatic hydrocarbons (PAHs).

This one-day workshop will examine recent research on particulate pollution from aromatics in motor fuel in an attempt to answer two questions: **What are the principal origins, range, and**

**atmospheric actions of fine and ultrafine particles? What are the potential human health effects after they have been inhaled?**

The purpose of this workshop is to bring together leading researchers and other experts on the sources, extent, mechanics, and health implications of these airborne particles to discuss their origins, nature and potential health effects, and to help researchers to identify remaining questions. The audience will include other researchers, air quality regulators, policymakers, public health advocates, and scientific press.

We hope you can join us for this important event. For the convenience of attendees, a continental breakfast and networking lunch will be provided. For more information, please contact Dustin Thaler at [dthaler@energyfuturecoalition.org](mailto:dthaler@energyfuturecoalition.org).

*With support from:*



---

The United Nations Foundation DC office has moved! Our new address is 1750 Pennsylvania Avenue NW, Suite 300 Washington, DC 20006.

**From:** Dustin Thaler  
**Location:** National Academy of Sciences Building, 2101 Constitution Avenue NW,  
Washington, DC  
**Importance:** Normal  
**Subject:** Health Effects of Fine Particles from Vehicle Emissions  
**Start Date/Time:** Tue 4/1/2014 1:30:00 PM  
**End Date/Time:** Tue 4/1/2014 9:00:00 PM

...



National Institute of  
Environmental Health Sciences



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*With support from:*



**To:** Tom Buis[TBuis@GrowthEnergy.org]  
**Cc:** Machiele, Paul[machiele.paul@epa.gov]  
**From:** Argyropoulos, Paul  
**Sent:** Tue 9/30/2014 2:31:18 PM  
**Subject:** 2012 letter  
[ax-12-000-5743\\_response.pdf](#)

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

Web: [www.epa.gov](http://www.epa.gov)

**From:** Argyropoulos, Paul  
**Sent:** Tuesday, September 30, 2014 10:21 AM  
**To:** Tom Buis  
**Subject:** FW: Response to your Email

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123



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Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

Web: [www.epa.gov](http://www.epa.gov)

**From:** Argyropoulos, Paul  
**Sent:** Tuesday, September 09, 2014 1:30 PM  
**To:** 'Kristy Moore'; Jones, Enesta  
**Cc:** Birgfeld, Erin; Mylan, Christopher; Hengst, Benjamin  
**Subject:** Response to your Email

Hi Kristy,

Thank you for your call and for your follow-up email. I believe I have a good enough understanding of the situation to offer you the following:

First, I believe the response containing the quote was, unfortunately, mis-aligned with the response to the initial question, which pertained to how the proposed city ordinance may impact the State Implementation Plan. Certainly, the inclusion of the language was not intended in the precise context it is currently being applied. That being said, the following is being offered to provide clarity as to the most appropriate way to make determinations about equipment compatibility.

General statements about equipment compatibility aren't necessarily an accurate reflection about any given area's situation. The most accurate way to determine whether underground storage tanks, (nationally, locally or otherwise) and their systems are compatible with gasoline blended with ethanol at concentrations greater than 10 percent by volume is for owners and operators of the equipment to verify, through appropriate documentation, whether their equipment is compatible with storing or dispensing such blends. This may be accomplished in a number of ways, including through site specific verifiable documentation in possession of the station owner or possibly through state or local permits or records that support verification. Without verification, it will be difficult for owners of the underground storage tank systems to demonstrate compatibility. However, EPA also issued guidance (<http://www.epa.gov/oust/compend/biofuels-compat-guidance.pdf>) in 2011 that provides a number of additional acceptable methods for owners and operators of UST systems storing

ethanol-blended fuels greater than 10 percent ethanol or biodiesel-blended fuels greater than 20 percent biodiesel to demonstrate compatibility under 40 CFR 280.32. If the UST owner and operator is not able to demonstrate that the UST system is made of materials that are compatible with the ethanol blend or biodiesel blend stored, according to 40 CFR 280.32, the UST owner and operator may not legally use the system to store those fuels.

I trust this provides you with the information you need.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: 202-577-9354

Email: [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov)

Web: [www.epa.gov](http://www.epa.gov)

**From:** Kristy Moore [<mailto:KMoore@ethanolrfa.org>]

**Sent:** Tuesday, September 09, 2014 9:22 AM

**To:** Jones, Enesta; Argyropoulos, Paul

**Cc:** Birgfeld, Erin

**Subject:** RE: EPA Official Statement

Good Morning- First thank you Paul for the discussion yesterday regarding the questionable statement provided by EPA to OPIS in regards to the proposal to offer E15 in the Chicago area. It's unfortunate that it has taken EPA over 3 weeks to respond to my inquiry and your questionable quote was used again yesterday by OPIS on the same topic. (Article attached:

Proposed E15 Mandate Remains in Limbo.)

Second, I have also attached here the official statement from USEPA on underground storage tanks given to OPIS (See attached: Follow UP with OPIS Re: Chicago City Council Proposal/ E15.) I believe your statement to be completely unfounded and misleading that "all of them..." referring to underground storage tanks are incompatible with E15. I have been requesting EPA provide the technical evidence to support such a statement or correct the record from this misleading and damaging statement. Please let me know how I can help you. KM.

Kristy Moore

Renewable Fuels Association

O- 202.315.2468

C- 309.830.6154

[kmoore@ethanolrfa.org](mailto:kmoore@ethanolrfa.org)

**From:** Jones, Enesta [<mailto:Jones.Enesta@epa.gov>]  
**Sent:** Wednesday, September 03, 2014 4:06 PM  
**To:** Kristy Moore  
**Cc:** Birgfeld, Erin; Argyropoulos, Paul  
**Subject:** Re: EPA Official Statement

Kristy,

I apologize for the delay.

Erin Birgfeld and Paul Argropoylous, copied here, will be in touch with a response.

**Enesta Jones**

U.S. EPA, Office of Media Relations

**Desk:** 202.564.7873

**Cell:** 202.236.2426

On Sep 3, 2014, at 7:32 AM, "Kristy Moore" <[KMoore@ethanolrfa.org](mailto:KMoore@ethanolrfa.org)> wrote:

Ms. Jones- I am growing weary waiting for a response to my request. When asked for a comment in July 2014 by OPIS on the Chicago consideration of E15, EPA was very quick (a few days??) with a response that "all" tanks were incompatible with E15. Now when questioned for the official reference to support such a claim, it has been weeks and I still have not gotten an answer to my request for the assessment that should be the basis for the Agency making this type of comment. Why am I not getting an answer to my request?

Do I need to take my questions to another person, such as Ms. Hoskinson the Director of OUST or Ms. McCarthy the Administrator, in the Agency to get an answer? Please provide an alternate contact ASAP if that is the case. KM.

**From:** Jones, Enesta [<mailto:Jones.Enesta@epa.gov>]  
**Sent:** Tuesday, August 26, 2014 8:32 AM  
**To:** Kristy Moore  
**Subject:** Re: EPA Official Statement

My apologies, Kristy. We are actively looking into this. I will be back in touch.

**Enesta Jones**

U.S. EPA, Office of Media Relations

**Desk:** 202.564.7873

**Cell:** 202.236.2426

On Aug 26, 2014, at 9:31 AM, "Kristy Moore" <[KMoore@ethanolrfa.org](mailto:KMoore@ethanolrfa.org)> wrote:

Good Morning Ms. Jones. I am surprised that I have not received a comment back from you as to your comments on USTs in Chicago that was over 2 weeks ago. When making a



confirmative statement such as "all" of the tanks, this should be based on an investigation, documentation. All we are asking for is the investigation details used to develop such a statement. KM.

**From:** Kristy Moore  
**Sent:** Tuesday, August 19, 2014 10:52 AM  
**To:** 'Jones, Enesta'  
**Subject:** RE: EPA Official Statement

Here's the original OPIS article with the EPA quote in the last paragraph. Sorry I had to get a copy from our Communications Director. KM.

**From:** Jones, Enesta [<mailto:Jones.Enesta@epa.gov>]  
**Sent:** Tuesday, August 19, 2014 10:35 AM  
**To:** Kristy Moore  
**Subject:** Re: EPA Official Statement

Kristy,

Do you have the OPIS article handy?

**Enesta Jones**

U.S. EPA, Office of Media Relations

**Desk:** 202.564.7873

**Cell:** 202.236.2426

On Aug 19, 2014, at 11:16 AM, "Kristy Moore" <[KMoore@ethanolrfa.org](mailto:KMoore@ethanolrfa.org)> wrote:

Good Morning- Do you have any response for me yet? Thank you for your assistance here.  
KM.

**From:** Jones, Enesta [<mailto:Jones.Enesta@epa.gov>]  
**Sent:** Monday, August 11, 2014 5:10 PM  
**To:** Kristy Moore

**Subject:** Re: EPA Official Statement

Checking Kristy.

**Enesta Jones**

U.S. EPA, Office of Media Relations

**Desk:** 202.564.7873

**Cell:** 202.236.2426

On Aug 11, 2014, at 5:51 PM, "Kristy Moore" <[KMoore@ethanolrfa.org](mailto:KMoore@ethanolrfa.org)> wrote:

Ms. Jones- Good afternoon. Recently, you provided a statement to the Oil Price Information Service regarding the state of compatibility of the Chicago area underground storage tanks with ethanol blended fuels. We are requesting the official technical assessment/ resources to support this statement. Please review the attached letter and respond at your earliest convenience.

Please do not hesitate to contact me if you have any questions, my contact information is listed below here. KM.

Kristy Moore  
Vice President of Technical Services  
Renewable Fuels Association  
Office- 202.315.2468  
Cell- 309.830.6154  
[kmoore@ethanolrfa.org](mailto:kmoore@ethanolrfa.org)<<mailto:kmoore@ethanolrfa.org>>

[www.ethanolrfa.org](http://www.ethanolrfa.org)<<http://www.ethanolrfa.org/>>

Our new DC office address: 425 Third St. SW, Suite 1150, Washington DC 20024

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<RFA Letter to US EPA OUST Compatibility with E15 Aug 2014.pdf>

<FW: BIOFUELS UPDATE: \*\*\*Chicago's E15 Mandate Tabled after Public Hearing.eml>

<RFA Letter to US EPA OUST Compatibility with E15 Aug 2014.pdf>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

**JUN 20 2012**

OFFICE OF  
AIR AND RADIATION

Mr. Bob Dinneen  
President and Chief Executive Officer  
Renewable Fuels Association  
425 Third Street, S.W.  
Washington, D.C. 20024

Dear Mr. Dinneen:

Thank you for your March 27, 2012, letter to the U.S. Environmental Protection Agency Administrator Lisa Jackson regarding your claims of disparate treatment of 10 volume percent ethanol blends (E10) and 15 volume percent ethanol blends (E15) under our gasoline volatility regulations. Administrator Jackson asked that I respond on her behalf, and I welcome the opportunity to address the important issue that you raise.

We have looked at this issue in a number of Agency contexts and our technical and legal assessment, most recently described in the Misfueling Mitigation Measures Rulemaking, is that the 1 psi waiver for E10 cannot be legally extended for E15 nor is it technically supportable, 76 FR 44406, at 44433 (July 25, 2011). The clear language of the Clean Air Act (CAA) providing the 1 psi waiver is exclusive for E10. In the October 13, 2010 and June 26, 2011 partial waiver decisions for E15, the Agency issued an interpretive decision that CAA 211(h)(4) limits the 1 psi waiver to fuel blends containing gasoline and 9-10 volume percent ethanol. The Agency also concluded that granting a 1 psi waiver for E15 would increase evaporative emissions and lead to vehicles exceeding their evaporative emission standards in use. As the Agency does not have the authority to allow that, it could not grant a 211(f)(4) waiver to E15 unless it had a RVP limit of 9 psi.

In your letter, you state that the disparate treatment of E10 and E15 with regard to volatility regulation would lead inexorably to market disruption. You neglect to point out that such "disparate treatment" is already the case for the 40 percent of the gasoline pool to which the 1 psi E10 waiver does not apply (e.g., Reformulated Gasoline and States that do not allow the 1 psi E10 waiver). However, the Clean Air Act does not allow the summertime volatility of E15 to be raised, and doing so would perpetuate the emission concerns that already exist today with higher gasoline volatility.

Again, thank you for your letter. I appreciate the opportunity to be of service and trust the information provided is helpful.

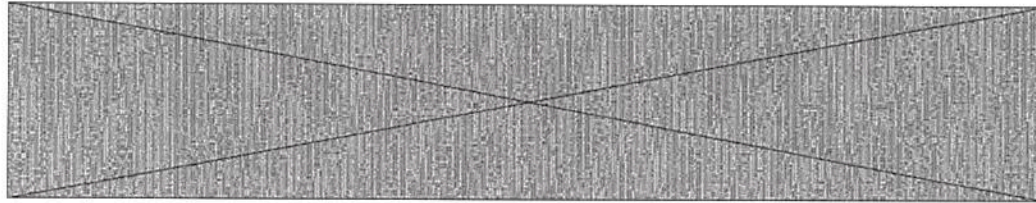
Sincerely,

A handwritten signature in black ink, appearing to read "Gina McCarthy".

Gina McCarthy  
Assistant Administrator



**To:** Machiele, Paul[machiele.paul@epa.gov]  
**From:** Christina Martin  
**Sent:** Wed 2/13/2013 2:50:04 AM  
**Subject:** RFA on State of the Union: Biofuels Can Eco-Boost the Economy



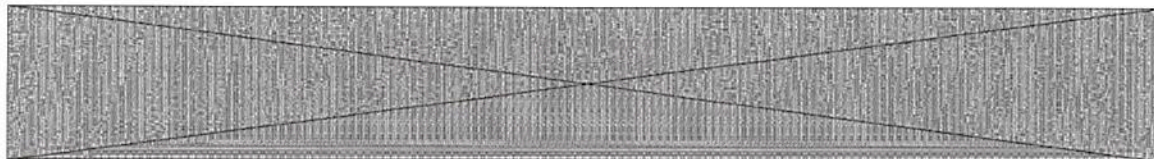
## **RFA on State of the Union: Biofuels Can Eco-Boost the Economy**

(February 12, 2013) WASHINGTON — During tonight's State of the Union address, President Obama spoke of the importance of jobs and strengthening the American economy. Cueing off those remarks, Bob Dinneen, President and CEO of the Renewable Fuels Association, said:

"Biofuels can provide the eco-boost the U.S. economy needs. Ethanol is a high octane engine driving economic growth and job creation, especially in rural America. Last year, the ethanol industry directly employed over 87,000 people. As an industry, ethanol supported another nearly 296,000 indirect and induced jobs across a wide spectrum of industries and sectors. In addition, ethanol contributed \$43.4 billion to the GDP.

"Ethanol's ability to strengthen this country's security and stability doesn't end with job creation. Thanks to domestically produced ethanol, 465 million barrels of imported oil were displaced. That is serious money — \$47.2 billion dollars in 2012 to be exact — that did not end up in the coffers of Middle Eastern and Venezuelan leaders. There is no question that policies like the Renewable Fuel Standard have been a success in fostering greater energy independence.

"The ethanol industry is grateful to President Obama for his vision of a stronger, cleaner, more self-reliant country and his continuing support of the renewable fuels industry and the Renewable Fuel Standard. Working together we can continue to address environmental issues such as meaningful greenhouse gas reduction as well as the tough economic challenges of job creation and economic and national security."



**Contact:**  
Christina Martin  
Executive Vice President  
Renewable Fuels Association  
(202) 289-3835

[cmartin@ethanolrfa.org](mailto:cmartin@ethanolrfa.org)

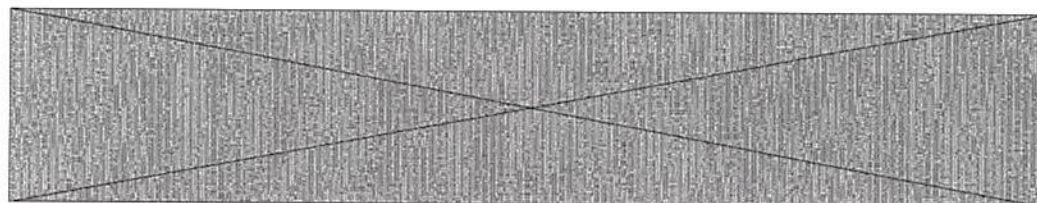
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**To:** Machiele, Paul[machiele.paul@epa.gov]  
**From:** Christina Martin  
**Sent:** Tue 2/19/2013 4:15:20 PM  
**Subject:** Joint Statement: EU Tariff is Unprecedented, Unfounded — Will be Challenged



## **Joint Statement: EU Tariff is Unprecedented, Unfounded — Will be Challenged**

(February 19, 2013) WASHINGTON — The European Commission (EC) is officially imposing a \$83.03 per metric ton tariff on U.S. ethanol entering the European Union (EU). Commenting on the publishing of the decision, the Renewable Fuels Association (RFA) and Growth Energy (GE) issued the following statement:

“This tariff is outrageous and based on absolutely no facts or evidence of harm. An extensive investigation was conducted and there was no proof to substantiate the European Union’s protectionist claims of dumping. Imposing a country wide anti-dumping tariff is unprecedented and unfounded. This is blatant protectionism at its worst. This is absolutely not the final chapter. We will challenge this policy in every manner possible.”

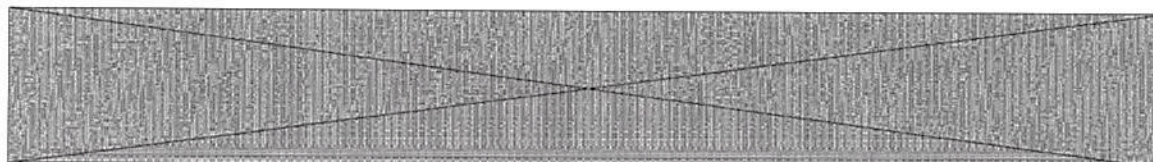
### ***About the Renewable Fuels Association***

*The RFA is the national trade association for the U.S. ethanol industry. Since 1981, the RFA serves as the voice of the ethanol industry, providing advocacy, authoritative analysis, and important industry data to its members, Congress, federal and state government agencies, strategic partners, the media and other opinion-leader audiences. For more information, visit [www.EthanolRFA.org](http://www.EthanolRFA.org).*

### ***About Growth Energy***

*Growth Energy is a group committed to the promise of agriculture and growing America's economy through cleaner, greener energy. Growth Energy members recognize America needs a new ethanol approach. Through smart policy reform and a proactive grassroots campaign, Growth Energy promotes reducing greenhouse gas emissions, expanding the use of ethanol in gasoline, decreasing our dependence on foreign oil, and creating American jobs at home. More information can be found at [GrowthEnergy.org](http://GrowthEnergy.org).*

Press contact: Michael Frohlich at (202) 545-4000 or [MFrohlich@growthenergy.org](mailto:MFrohlich@growthenergy.org).



**Contact:**  
Christina Martin  
Executive Vice President  
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(202) 289-3835  
[cmartin@ethanolrfa.org](mailto:cmartin@ethanolrfa.org)

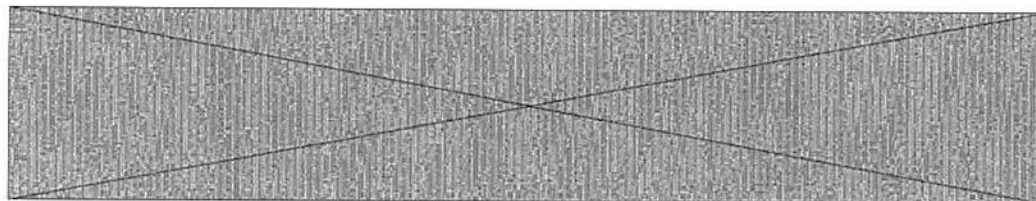
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**To:** Machiele, Paul[machiele.paul@epa.gov]  
**From:** Christina Martin  
**Sent:** Thur 11/14/2013 7:34:41 PM  
**Subject:** Algenol Biofuels Joins Advanced Ethanol Council (AEC)



## **Algenol Biofuels Joins Advanced Ethanol Council (AEC)**

(November 14, 2013) WASHINGTON — The Advanced Ethanol Council (AEC) is pleased to welcome Algenol Biofuels as a new member. Algenol is a global, industrial biotechnology company focused on commercializing its patented algae technology platform for the production of ethanol and other biofuels. Algenol's DIRECT TO ETHANOL® technology uses sunlight, algae, non-arable land and carbon dioxide to produce ethanol and waste biomass that can be converted into gasoline, diesel and jet fuel.

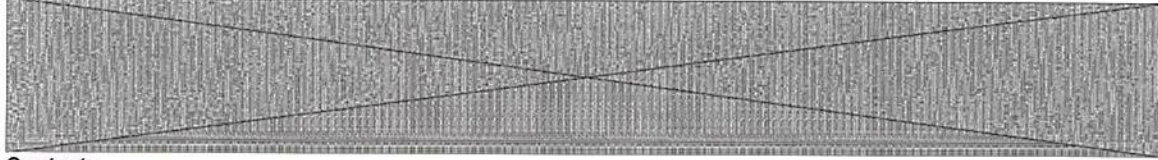
"There are clear synergies between Algenol's efforts to deploy its DIRECT TO ETHANOL® technology and the Advanced Ethanol Council's singular focus on developing forward-looking policies and open markets for the advanced ethanol sector," said Paul Woods, President and CEO of Algenol Biofuels. "The Advanced Ethanol Council is at the center of any discussion about advanced biofuels, but we were particularly drawn to the group's focus on promoting the unique attributes and value proposition of advanced ethanol."

Algenol operates a 4-acre process development unit that produces ethanol in modular photo-bioreactors and a 36-acre pilot scale integrated biorefinery (IBR) in Lee County, Florida. The IBR is demonstrating Algenol's approach to building out fully integrated commercial facilities and also serves as a testing facility for the company and its partners to integrate technologies that convert waste algae into gasoline, jet and diesel fuel. Algenol's IBR has produced all four fuel types at a rate exceeding 9,000 gallons per acre, and 144 gallons of these fuels per tonne of CO<sub>2</sub>.

"We are very pleased to have Algenol Biofuels on board at the Advanced Ethanol Council (AEC)," said Brooke Coleman, Executive Director of the AEC. "As we mature as an industry, it is critical that advanced ethanol interests align from both a policy and messaging perspective. We look forward to working with Paul and the Algenol team on strategies that will put the industry in a position to succeed in 2013 and beyond."

The Advanced Ethanol Council (AEC) represents worldwide leaders in the effort to develop and commercialize the next generation of ethanol fuels, ranging from cellulosic ethanol made from dedicated energy crops, forest residues and agricultural waste to advanced ethanol made from municipal solid waste, algae and other feedstocks.

The AEC is the only advanced biofuel group with the singular purpose of promoting advanced ethanol fuels and technologies.



**Contact:**

Christina Martin  
Executive Vice President  
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(202) 289-3835  
[cmartin@ethanolrfa.org](mailto:cmartin@ethanolrfa.org)

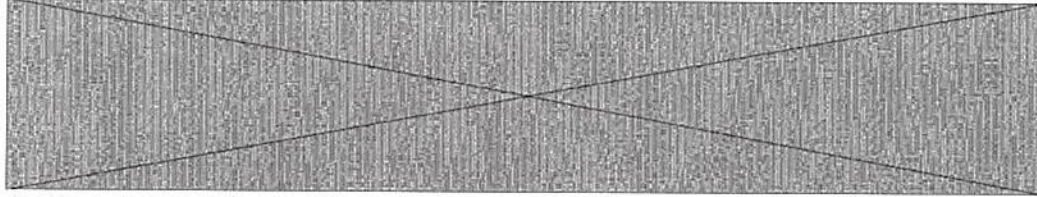
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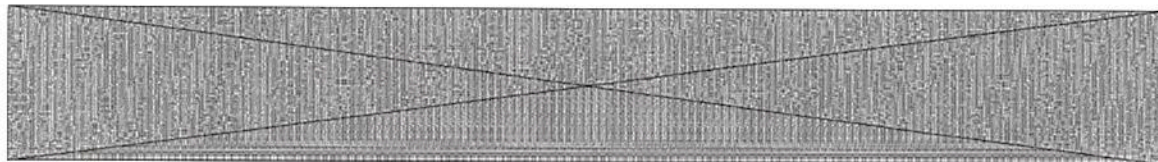
**To:** Machiele, Paul[machiele.paul@epa.gov]  
**From:** Christina Martin  
**Sent:** Thur 4/11/2013 1:41:19 PM  
**Subject:** RFA to AFPM: Reckless, Revisionist Statement and Jury Verdict are Proof Oil Companies Cannot Be Trusted with this Nation's Energy Future



## **RFA to AFPM: Reckless, Revisionist Statement and Jury Verdict are Proof Oil Companies Cannot Be Trusted with this Nation's Energy Future**

(April 11, 2013) WASHINGTON — Following a reckless, revisionist statement by the American Fuel and Petroleum Manufacturers Association (AFPM) attempting to compare the recent New Hampshire MTBE lawsuit loss by the oil industry to E15, Bob Dinneen, President and CEO of the Renewable Fuels Association, emphatically responded:

“AFPM and the oil companies are living in a fantasy parallel universe if they think they can revise history to tarnish E15 and the RFS. MTBE did not go through the same 211F waiver process that E15 did. MTBE did not undergo six million miles of testing like E15 did. The oil companies pushed 15 percent MTBE approval under a much less rigorous waiver process that did not require the robust emissions and drivability testing that E15 has successfully completed. Oil companies also did not conduct extensive 211(b) health effects testing prior to the registration of MTBE for commercial use. Oil companies chose MTBE over biodegradable ethanol because it was a product they produced and it increased their profits. In fact, they used MTBE to keep ethanol out of the market because the two fuels could not be used together. Unfortunately, MTBE was not compatible with the fuel distribution system. It leaked from tanks and quickly migrated to drinking water supplies. MTBE is toxic. Oil companies losing the court case in New Hampshire screams a dire warning that oil companies should not be trusted with our energy future. Oil companies have a disturbing track record of putting their monopoly ahead of innovation and progress, and their profits ahead of consumer pocketbooks. AFPM's pernicious campaign against ethanol and the RFS, as reflected in this latest attempt to blame EPA for the oil company's investment in toxic MTBE to be used as another rock to throw at America's most successful biofuel and energy policy is just the latest, sad, desperate example.”



**Contact:**  
Christina Martin

Executive Vice President  
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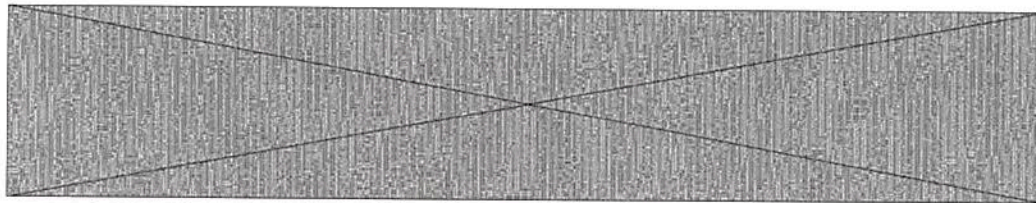
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To: Machiele, Paul[machiele.paul@epa.gov]  
From: Dawn Moore  
Sent: Fri 11/15/2013 6:53:31 PM  
Subject: The EPA's RVO Proposal Cannot Stand



## The EPA's RVO Proposal Cannot Stand

(November 15, 2013) WASHINGTON — The Environmental Protection Agency (EPA) today released the proposed 2014 Renewable Fuel Standard (RFS) volumetric requirements. For 2014, EPA is proposing to lower the conventional renewable fuel requirement from the statutory level of 14.4 billion gallons (BG) to 13 billion gallons, and slash the total RFS volumetric requirement from 18.15 BG to 15.21 BG. However, the EPA does not have the statutory authority to lower the total requirement by more than the total reduction in advanced and cellulosic. In addition, the so-called “blend wall” does not qualify under the law as grounds for a “general waiver” of the RFS volumes. The specific conditions needed to effectuate a “general waiver”—severe economic harm or inadequate domestic supply of renewable fuel—are not present. The cellulosic biofuel volumetric requirement was waived to 17 million gallons, and the total advanced volumetric requirement was waived to 2.2 billion gallons. The proposed 2014 blending requirements will be open to public review and comment before a final ruling is made. Commenting on today's announcement, Bob Dinneen, President and CEO of the Renewable Fuels Association (RFA), said:

“By re-writing the statute and re-defining the conditions upon which a waiver from the RFS can be granted, EPA is proposing to place the nation's renewable energy policy in the hands of the oil companies. That would be the death of innovation and evolution in our motor fuel markets, thus increasing consumer costs at the pump and the environmental cost of energy production. This proposal cannot stand.

“During the comment period, I expect reason and fact to replace the fear and misinformation peddled by Big Oil and seemingly adopted for this proposal. But an Administration committed to addressing climate change cannot turn its back on biofuels. An Administration managing an economic recovery cannot watch gasoline prices rise for lack of competition. An Administration intent upon seeing the next generation of biofuel technology commercialized cannot eviscerate the demand base that would allow those fuels to succeed. And an Administration that understands the importance of a healthy farm economy cannot rip away demand that farmers relied upon in growing the largest corn crop in history, particularly at a time when there is no Farm Bill safety net. This Administration, a consistent supporter of the RFS, will not affect its demise.”

Dinneen concluded, “I look forward to engaging the EPA and others in the Administration in constructive dialogue as to the path forward.”

Contact:

Slashing the 2014 targets could lead to negative impacts for America's farmers and consumers, and ultimately cut American jobs, harm the environment, and discourage the future of biofuels. The impact of these numbers could be seen far and wide, including:

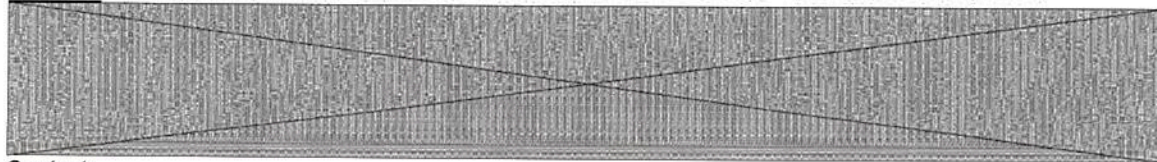
- Corn Prices Sink and Farm Income Falls
- Increased Demand for Gasoline and Higher Pump Prices
- Increased GHG emissions from Transportation Sector
- Puts American Jobs at Risk
- Discourages Investment in Biofuel Infrastructure
- Deters Investment in Advanced and Cellulosic Biofuels

Dinneen discussed today's announcement with Cindy Zimmerman of "The Ethanol Report". For questions regarding audio, please contact Cindy Zimmerman at [cindy@zimmcomm.biz](mailto:cindy@zimmcomm.biz).

Audio 1

Audio 2

Audio 3



Contact:  
Dawn Moore  
Communications Director  
Renewable Fuels Association  
(202) 289-3835  
[dmoore@ethanolrfa.org](mailto:dmoore@ethanolrfa.org)

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**To:** Grundler, Christopher[grundler.christopher@epa.gov]; Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Machiele, Paul[machiele.paul@epa.gov]; Bunker, Byron[bunker.byron@epa.gov]; Manners, Mary[manners.mary@epa.gov]; Korotney, David[korotney.david@epa.gov]  
**From:** Larry Schafer  
**Sent:** Fri 3/1/2013 9:57:38 PM  
**Subject:** Meeting Request for Friday March 8th

Chris and team EPA:

Both Gary Haer, NBB Chairman and Anne Steckel, NBB VP of Federal Affairs will be joining me in Anne Arbor next Friday, March 8 at the 2013 RVO Hearing.

While we are in your neighborhood we would like to spend a few minutes with your team (20-30 minutes) to chat briefly about the RFS program.

We don't have a grand agenda, but would like a few minutes.

Please let me know if we can arrange a brief meeting.

Thanks

-----  
Larry Schafer

National Biodiesel Board

O: 202.737.8801

M: 202.997.8072

[LSchafer@Biodiesel.org](mailto:LSchafer@Biodiesel.org)  
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[www.americasadvancedbiofuel.com](http://www.americasadvancedbiofuel.com)

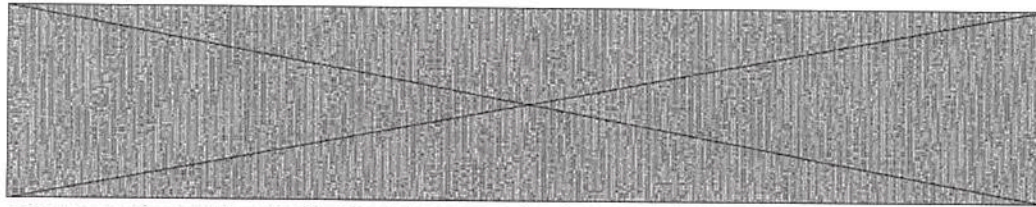
1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004



To: Machiele, Paul[machiele.paul@epa.gov]  
From: Christina Martin  
Sent: Thur 2/21/2013 3:32:17 PM  
Subject: State by State, US Ethanol Industry Creating Jobs & Economic Opportunities



## State by State, US Ethanol Industry Creating Jobs & Economic Opportunities

(February 21, 2013) Washington, D.C. – Today, the Renewable Fuels Association (RFA) released a state-by-state update to the “Contribution of the Ethanol Industry to the Economy of the United States,” an economic impact analysis performed by Cardno ENTRIX. The original report, released earlier this month at RFA’s National Ethanol Conference, found that the industry has supported over 383,000 direct and indirect and induced jobs across all sectors of the economy last year. The industry contributed \$43.3 billion to GDP and \$30.2 billion in household income.

Commenting on the state-by-state breakout, Bob Dinneen, RFA’s president and CEO, said, “It is clear that the ethanol industry is a powerful economic driver. We are successfully creating job and economic opportunities in a tough economy. Not only are we helping revitalize rural communities across this country, we are positively impacting states outside of the Corn Belt. We are building ethanol refineries and hiring staff for newly operational plants across this nation. We are becoming an economic engine coast to coast, border to border. This economic momentum should not be jeopardized by tampering with the Renewable Fuel Standard (RFS). The RFS is a proven success when it comes to creating jobs, increasing American energy independence, and improving the environment. Don’t mess with the RFS.”

The top ten states experiencing the economic benefits of having ethanol plants operating locally are:

State	Jobs (Direct, indirect, induced)
Iowa	63,532
Illinois	54,083
Nebraska	48,402
Minnesota	34,784
Indiana	25,350
South Dakota	22,970
Wisconsin	15,591
Ohio	15,167
Kansas	13,043
North Dakota	7,810

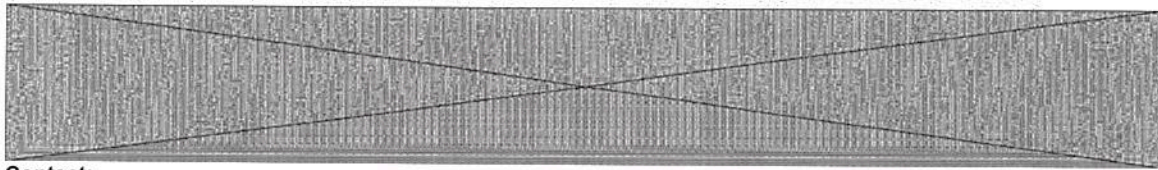
Sample states falling outside the traditional Corn Belt include:

State	Jobs (Direct, indirect, induced)
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Texas	5,696
Colorado	4,829
Tennessee	4,039
Pennsylvania	3,263
New York	3,210
California	2,147

For a full list of states please see the Cardno ENTRIX update, [here](#).

For an [infographic](#) demonstrating the types of jobs and industry sectors positively impacted by the ethanol industry, please visit [www.EthanolRFA.org](http://www.EthanolRFA.org).



Contact:

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**To:** Foster, Mark H. (Perkins Coie)[MarkFoster@perkinscoie.com]  
**Cc:** Machiele, Paul[machiele.paul@epa.gov]; Burkholder, Dallas[burkholder.dallas@epa.gov];  
Manners, Mary[manners.mary@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]  
**From:** Bunker, Byron  
**Sent:** Wed 4/8/2015 3:09:27 PM  
**Subject:** RE: Coalition Letter to OMB

Hi Mark,

Based on the electronic calendars, May 5, 8 and 12 are all bad days for this meeting. It looks like we should be able rearrange calendars to accommodate a meeting the remaining days over those first two weeks. We should confirm a specific time before anyone books a plane ticket, but I think we can be pretty flexible the other days.

Thanks,

Byron

\*\*\*\*\*

Byron Bunker

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\*\*\*\*\*

**From:** Foster, Mark H. (Perkins Coie) [mailto:MarkFoster@perkinscoie.com]  
**Sent:** Wednesday, April 01, 2015 5:10 PM  
**To:** Bunker, Byron  
**Subject:** RE: Coalition Letter to OMB

Mr. Bunker,

Our coalition members are unavailable to meet with you on April 15. I am currently soliciting dates during the first two weeks of May from our members. Are there any dates during that time period that work for you and the staff in Ann Arbor?

Regards,  
Mark Foster

**Mark Harrison Foster, Jr. | Perkins Coie LLP**

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E-MAIL: [markfoster@perkinscoie.com](mailto:markfoster@perkinscoie.com)

**From:** Bunker, Byron [mailto:bunker.byron@epa.gov]  
**Sent:** Tuesday, March 31, 2015 8:41 AM  
**To:** Foster, Mark H. (Perkins Coie); Grundler, Christopher; Korotney, David  
**Cc:** Johnson Koch, LeAnn M. (Perkins Coie); David Carroll, Hunt Refining Company; H. Don Davis, Ergon; Ronald Hurst, Placid Refining; Warren Neufeld, Wyoming Refining; James Ranspot, Alon USA



Energy; Robert Redd, US Oil & Refining; Stephen Sherk, American Refining; Burkholder, Dallas; Machiele, Paul; Argyropoulos, Paul; Hengst, Benjamin; Simon, Karl; Charmley, William  
**Subject:** RE: Coalition Letter to OMB

Dear Mr. Foster,

Our Office Director, Chris Grundler, has asked me to respond on his behalf. We appreciate this group of refiners coming together to raise your collective concerns to the Agency. As the issue you are raising is highly technical in nature, I would suggest that we meet at EPA's National Vehicle and Fuel Emissions Laboratory in Ann Arbor, MI where a significant portion of our fuels policy and analysis team works.

I need to confirm with a few more participants but Wednesday April 15 at 10:00 AM appears to work for the EPA team. Please let me know if that date and time will work for your coalition.

Best regards,

Byron

\*\*\*\*\*

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**From:** Foster, Mark H. (Perkins Coie) [mailto:MarkFoster@perkinscoie.com]

**Sent:** Thursday, March 26, 2015 5:19 PM

**To:** Bunker, Byron; Grundler, Christopher; Korotney, David

**Cc:** Johnson Koch, LeAnn M. (Perkins Coie); David Carroll, Hunt Refining Company; H. Don Davis, Ergon; Ronald Hurst, Placid Refining; Warren Neufeld, Wyoming Refining; James Ranspot, Alon USA Energy; Robert Redd, US Oil & Refining; Stephen Sherk, American Refining

**Subject:** Coalition Letter to OMB

Dear Messrs. Bunker, Grundler, and Korotney,

The attached letter, written on behalf of a coalition of small refinery owners, has been sent to the Office of Information and Regulatory Affairs at the Office of Management and Budget. As explained in this letter, small refineries are suffering disproportionately under the current renewable fuel standard.

We would like to find time in the coming weeks to discuss with you this standard and possible solutions to the issues we have identified. Please inform me of your availability during the first two weeks in April, and I will set a meeting during which we can address these issues. If you have any other questions, do not hesitate to contact me.

Sincerely,

Mark Foster

Mark Harrison Foster, Jr. | Perkins Coie LLP

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**To:** Corr, Chuck[corr@adm.com]; teresa.alleman@nrel.gov[teresa.alleman@nrel.gov];  
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 Shon.VanHulzen@POET.COM[Shon.VanHulzen@POET.COM];  
 stephen.voss@oneok.com[stephen.voss@oneok.com]  
**Cc:** Stahle, Susan[Stahle.Susan@epa.gov]; Machiele, Paul[machiele.paul@epa.gov];  
 Caldwell, Jim[Caldwell.Jim@epa.gov]  
**From:** Herzog, Jeff  
**Sent:** Thur 4/3/2014 3:25:30 PM  
**Subject:** RE: Suggested text for inclusion in ASTM draft specification on natural gasoline re the  
 EPA sub-sim requirement

Chuck et.al.

EPA is suggesting the following text be added to the draft ASTM specification for natural gasoline re the EPA sub-sim requirement for ethanol flex fuel.

Before manufacturers of ethanol flex fuel may introduce its fuel into commerce, manufacturers must demonstrate its fuel is "substantially similar" to fuels used to certify FFVs or obtain a waiver. See CAA section 211(f).

The above text might best fit as a footnote to Table 1 as we discussed during our last call.

We are also suggesting that this text be included in the context of the workmanship task force.

The FFV fuel in-use quality rulemaking on that is currently underway seeks to resolve uncertainties that currently exist regarding how ethanol flex fuel blenders could demonstrate



that they have satisfied the sub-sim requirement when they use hydrocarbon blendstocks other than certified gasoline and BOBs.

Thanks,

Jeff

Jeff Herzog, U.S. EPA, OTAQ, ASD  
(734) 214-4227

**To:** Kristy Moore[KMoore@ethanolrfa.org]; Anderson, Robert[Anderson.Robert@epa.gov]  
**Cc:** Bob M Dinneen[BobD@ethanolrfa.org]; Geoff Cooper[GCooper@ethanolrfa.org];  
rwhite@ethanolrfa.org[rwhite@ethanolrfa.org]; Weihrauch, John[Weihrauch.John@epa.gov]; Machiele,  
Paul[machiele.paul@epa.gov]  
**From:** Bunker, Byron  
**Sent:** Fri 2/28/2014 12:26:33 PM  
**Subject:** RE: EPA and E15 Concerns

Hi Robert,

Please work with Kristy to put some time on our calendar. Ideally let's find a time that Paul Machiele and John can join the discussion as well.

Thanks,

Byron

\*\*\*\*\*

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**From:** Kristy Moore [mailto:KMoore@ethanolrfa.org]  
**Sent:** Thursday, February 27, 2014 4:00 PM  
**To:** Anderson, Robert; Bunker, Byron  
**Cc:** Bob M Dinneen; Geoff Cooper; rwhite@ethanolrfa.org  
**Subject:** FW: EPA and E15 Concerns

Byron, Robert- I had a very concerning phone conversation on E15 and summer options for retailer today. See the email that we sent you last year on May 28, 2013 after we confirmed the options for retailers with you.

Can we set up a phone conversation ASAP to discuss this further? Thank you in advance for your quick response. KM.

**From:** Kristy Moore  
**Sent:** Tuesday, May 28, 2013 10:17 AM  
**To:** 'Bunker, Byron'  
**Cc:** Anderson, Robert; Bob M Dinneen; Cohen, Janet; Weihrauch, John; Manners, Mary  
**Subject:** RE: EPA and E15 Concerns

Thanks Byron. We are suggesting a conference call due to timing. This Thursday, Friday are generally open for everyone on our side, preferably Thursday. Janet- do either of those dates work for your staff?

Also, I wanted to share a volatility reminder that we sent out last week. The agenda will be the bullet points listed below. KM.

**From:** Bunker, Byron [mailto:bunker.byron@epa.gov]  
**Sent:** Wednesday, May 22, 2013 3:45 PM  
**To:** Kristy Moore  
**Cc:** Anderson, Robert; Bob M Dinneen; Cohen, Janet; Weihrauch, John; Manners, Mary  
**Subject:** RE: EPA and E15 Concerns

Hi Kristy,

Thank you for your note. I too was sorry to miss the meeting but happy to at least catch up with you for a few minutes at the airport. We have been meeting internal to discuss the issues raised by the RFA team at the meeting, and on some points at least, we agree that changes may be appropriate.

A meeting in the next few weeks would be timely for us. Please coordinate with Janet Cohen on the agenda, time and location for the meeting. Janet, I would like to participate in this meeting.

Thanks,

Byron

\*\*\*\*\*

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**From:** Kristy Moore [<mailto:KMoore@ethanolrfa.org>]

**Sent:** Tuesday, May 21, 2013 3:35 PM

**To:** Bunker, Byron

**Cc:** Anderson, Robert; Bob M Dinneen

**Subject:** EPA and E15 Concerns



Byron- I am sorry that you could not make the meeting at the EPA office on April 25, 2013; we expressed many grave concerns with the current operation of the E15 Marketplace Survey being conducted by RFGSA. Our concerns are elevated as we approach the summer volatility season where unequal treatment of E10 and E15 fuel exist in EPA volatility requirements that will drive E15 out of the marketplace on June 1<sup>st</sup> until September 16<sup>th</sup>. The concerns expressed to your staff regarding the current E15 survey are as follows:

**Industry Burden:** With 99.9% survey costs attributal to E10 and no E15 available for sale during the summer months due to disparity in EPA volatility requirements, the nationwide survey application is wildly disproportionate and the burden of the survey should be severely reduced or suspended entirely. As it stands, EPA is essentially requiring the ethanol industry to fund a wholly new E10 compliance mechanism with no benefit accruing to the industry.

**E15 Image Damage:** The fuel survey is sampling nearly 99.9% gasoline with 10% or less ethanol content and noncompliance notices are being sent under an "E15" program name making retailers apprehensive about E15. The name of the survey as the "E15 Survey" is misleading and an inappropriate description for the sampling and analysis that is being conducted per EPA mandate.

**Severe Lack of Education:** The RFGSA survey program is novel for conventional gasoline areas; retailers are unaware of the RFGSA organization and the compliance work that is being conducted per EPA regulatory requirements. There is a lack of education with retailers that EPA has redefined the ethanol content that is allowed in gasoline. Retailers are not aware that fuel blends above 10.0% ethanol up to 15.0% ethanol are classified as E15 in EPA regulations.

**RFGSA Survey Improvements Desperately Needed:** There are elements in the survey, specifically the E10 mislabeling PNC that are confusing or misleading in the communication to retailers. The notifications from RFGSA do not contain sufficient information to prompt retailer action. Retailers assume PNC notices from RFGSA are spam mail or misidentified as a solicitation for regulatory assistance.

RFA continues to be the sole source of education on survey design, operation and requirements for retailers. Neither EPA nor RFGSA is conducting an outreach and education program for the retail sector; we are concerned that RFA is being misconstrued as the regulatory authority for the survey, which is of great concern to RFA. We expressed these concerns to your staff and have had no follow up to date. Can we get together soon to discuss these numerous and critical concerns on the future of E15? KM.

Kristy Moore

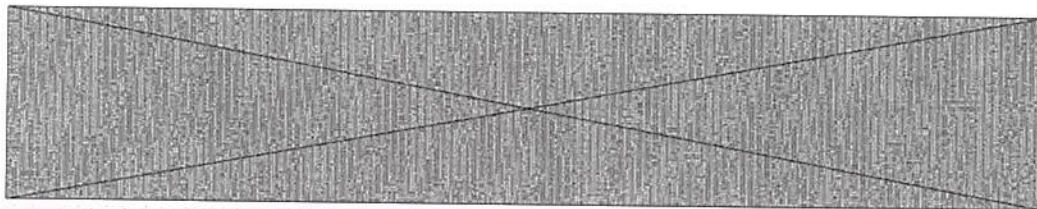
Renewable Fuels Association

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[kmoore@ethanolrfa.org](mailto:kmoore@ethanolrfa.org)

**To:** Machiele, Paul[machiele.paul@epa.gov]  
**From:** Christina Martin  
**Sent:** Fri 11/15/2013 6:56:14 PM  
**Subject:** Advanced Ethanol Council Disappointed by Proposed 2014 RFS Volume Obligation



## **Advanced Ethanol Council Disappointed by Proposed 2014 RFS Volume Obligation**

(November 15, 2013) WASHINGTON — The Advanced Ethanol Council expressed disappointment today in the proposed 2014 required volume obligation (RVO) for the federal Renewable Fuel Standard (RFS).

“While only a proposed rule at this point, this is the first time that the Obama Administration has shown any sign of wavering when it comes to implementing the RFS,” said Brooke Coleman, Executive Director of the Advanced Ethanol Council (AEC). “EPA is in the right ballpark for cellulosic biofuels, and we are confident that the final number will be the right one for the industry in 2014. But bigger picture issues must be resolved in the final rule because advanced biofuel investors also pay attention to the big picture.”

The Council pointed to unnecessary reductions to the advanced biofuel pool, unfounded concern about imaginary blend walls, and not enough faith in the mechanics of the RFS program among certain Administration officials as the primary issues that need to be resolved during the comment period.

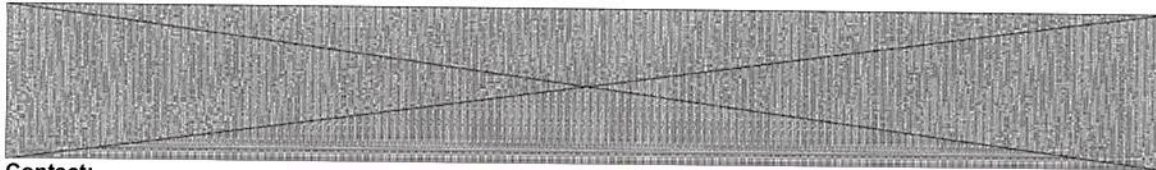
“What we’re seeing is the oil industry taking one last run at trying to convince administrators of the RFS to relieve the legal obligation on them to blend more biofuel based on clever arguments meant to disguise the fact that oil companies just don’t want to blend more biofuel. The RFS is designed to bust the oil monopoly. It’s not going to be easy,” added Coleman.

The Council added that the catalyst for too conservative a proposal is higher RIN prices in 2013.

“We hope that the Obama Administration will realize that reasonably higher RIN prices are a good thing instead of a bad thing. Higher RIN prices are a sign that the oil companies are predictably refusing to blend actual liquid gallons of fuel to comply with the RFS. But higher RIN prices are encouraging those unwilling to obstruct on RFS compliance to actually blend more renewable fuels. Investors are starting to see the RIN program drive more demand for renewable fuels with consumer savings at the pump. Now is not the time to depressurize the program,” Coleman said.

The Council added that the industry is more united than ever before, and will work together to fix the final rule.





**Contact:**

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**Executive Vice President**  
**Renewable Fuels Association**  
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